

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
No. 5:19-cv-00430-BO

U.S. Tobacco Cooperative Inc.,	)	
	)	
Plaintiff,	)	
	)	<b>U.S. TOBACCO COOPERATIVE INC.’S</b>
v.	)	<b>MOTION FOR SANCTIONS</b>
	)	
Certain Underwriters at Lloyd’s subscribing to	)	
Policy Numbers B1353DC1703690000 and	)	
B1353DC1602041000,	)	
	)	
Defendants.	)	

In accordance with Rules 26, 33, 34, 36, and 37 of the Federal Rules of Civil Procedure, and Rules 7.1, 7.2, 26.1, 33.1, 34.1, and 36.1 of the Local Rules of this Court, U.S. Tobacco Cooperative Inc. (“USTC”) hereby files its Motion for Sanctions (“Motion”). The bases for this Motion and the supporting authorities are set forth in the contemporaneously filed USTC’s Memorandum of Law in Support of Its Motion For Sanctions and accompanying Exhibits.

WHEREFORE, USTC requests that this Court grant its Motion For Sanctions and that the Court order sanctions against Insurers including, but not limited to: (i) an award of the fees and costs USTC has incurred in bringing this Motion and all previous motions to compel; (ii) dismissal of Insurers’ affirmative defenses; (iii) a default judgment on liability in USTC’s favor on Counts I-IV of USTC’s complaint; and (iv) an order setting a trial solely on the amount of damages to be awarded to USTC for Insurers’ breach of contract and bad faith, including pre-judgment interest and all other relief this Court deems just and proper.

Date: May 24, 2021.

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*Attorneys for Plaintiff U.S. Tobacco Cooperative Inc.*

**CERTIFICATE OF SERVICE**

I do hereby certify that I caused a true and correct copy of the above **U.S. TOBACCO COOPERATIVE INC.'S MOTION FOR SANCTIONS** to be filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all CM/ECF registered attorneys.

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This the 24th day of May, 2021.

/s/ Mark E. Anderson

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